

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor Toni Hardesty, Director

September 13, 2004

Certified Mail No. 7099 3220 0009 1975 3772

Jim Warren Merritt Brothers Lumber Co., Inc. P. O. Box 190 Athol, ID 83801-0190

RE:

Facility ID No. 055-00039, Merritt Brothers Lumber Co., Inc., Athol

Final Permit Letter

Dear Mr. Warren:

The Idaho Department of Environmental Quality (DEQ) is issuing modified Tier II Operating Permit and Permit to Construct (PTC) Number P-040106 to Merritt Brothers Lumber Co. Inc. in accordance with IDAPA 58.01.01.200 through 228 and 400 through 470 (Rules for the Control of Air Pollution in Idaho). This permit is effective immediately and is based on your permit application received on May 06, 2004. This permit replaces Tier II Operating Permit and Permit to Construct No. P-030103, issued February 6, 2004, the terms and conditions of which no longer apply.

This permit does not release Merritt Brothers Lumber Co. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Coeur d'Alene Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator

Air Quality Division

MB/SYC/bf

Permit No. P-040106

Enclosures



# Air Quality TIER II OPERATING PERMIT And PERMIT TO CONSTRUCT

## State of Idaho Department of Environmental Quality

**PERMIT No.: P-040106** 

FACILITY ID No.: 055-00039

AQCR: 62

CLASS: B

SIC: 2421

ZONE: 11

UTM COORDINATE (km): 521.6, 5310.2

#### 1. PERMITTEE

Merritt Brothers Lumber Company - Remanufacturing Division

#### 2. PROJECT

Modified Tier II Operating Permit and Permit to Construct

3. MAILING ADDRESS	CITY	STATE	ZIP	
Post Office Box 190	Athol	ID	83801	
4. FACILITY CONTACT	TITLE	TELEPHONE		
Jim Warren	Mill Manager	208-683-3321		
5. RESPONSIBLE OFFICIAL	TITLE	TELEPHONE		
Jim Warren	Mill Manager	208-683-3321		
6. EXACT PLANT LOCATION		COUNTY	Α,	
NE 1/4 NW 1/4 Section 16, Township 50	6 North, Range 3 West	Kootenai		

## 7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Dimensional lumber remanufacturing

#### 8. PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400-470 and IDAPA 58.01.01.200-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to the Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 of the Rules for the Control of Air Pollution in Idaho.

TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:

<u>September 13, 2004</u>

DATE EXPIRES:

November 26, 2007

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## Acronyms, Units And Chemical Nomenclature

AIRS Aerometric Information Retrieval System

AQCR Air Quality Control Region

bdft board feet

Btu British thermal unit
CO carbon monoxide

DEQ Idaho Department of Environmental Quality

dsef dry standard cubic feet

EPA U.S. Environmental Protection Agency

gr grain (1 lb = 7,000 grains)
HAPs hazardous air pollutants

IDAPA a numbering designation for all administrative rules in Idaho promulgated in accordance with

the Idaho Administrative Procedures Act

km kilometer

lb/hr pounds per hour lb/T pounds per ton

mmbdft/yr million board feet per year

NO<sub>X</sub> nitrogen oxides
OP operating permit
PM particulate matter

PM<sub>10</sub> particulate matter with an aerodynamic diameter of 10 micrometers or less

PTC permit to construct
PTE potential to emit
scf standard cubic feet

SIC Standard Industrial Classification Code

TAPs Toxic Air Pollutants

T/yr tons per year

UTM Universal Transverse Mercator

VOC volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: P-040106					
Permitte	Merritt Brothers Lumber Co.	E W. TO M. 0// 00000	Date Issued:	September 13, 2004	
Location	Athol, Idaho	Facility ID No. 055-00039	Date Expires	November 26, 2007	

## 1. PERMIT SCOPE

## **Purpose**

- 1.1 The permit to construct portion of this permit is to fulfill the new source review requirements for the construction of the second natural gas-fired boiler, and the fourth lumber drying kiln at the facility. The purpose of the Tier II operating permit is to allow the operations of all air pollution emitting activities at the facility while protecting ambient air quality standards.
- 1.2 This permit incorporates and replaces Tier II Operating Permit and Permit to Construct No. P-030103, issued February 6, 2004.

## Regulated Sources

1.3 Table 1.1 below lists all sources of emissions that are regulated in this permit.

**Table 1.1 REGULATED EMISSION SOURCES** 

Permit Section	Source Description	Emission Controls
3	Cleaver Brooks gas-fired boiler No.1, Model L-59569, 29.3 million Btu/hr, constructed in 11/74 and installed at the facility in 2/01. Cleaver Brooks gas-fired boiler No.2, Model CB200-350, 14.65 million Btu/hr, constructed in 4/26/73 and is allowed to install after 5/20/04 when the 15-day pre-construction application was declared complete.	None
4	Lumber drying kilns (3) were installed in 2/01 and 3/02. The forth kiln is allowed to install after 5/20/04 when the 15-day pre-construction application was declared complete. This addition makes the drying kilns (4) having the total capacity of 130 mmbdft/yr	None
5	Cyclone No. 1 — Old planer cyclone Cyclone No. 2 — Rip saw relay cyclone Cyclone No. 3 — Rip saw cyclone Cyclone and Baghouse No. 4 — New planer cyclone and baghouse Cyclone No. 5 — Finger-jointer cyclone Cyclone No. 6 — Finger-jointer cyclone (pull through) Cyclone No. 7 — Remanufacturing, chips cyclone, chip bin, target box	Cyclones and baghouse
2	Fugitive emissions sites (i.e. old planer chip bin truck loadout, planer shavings bin truck loadout, and plant road.)	Reasonably control (Fugitive dust management plan)

## Permit Requirements Summary

1.4 Table 1.2 below summarizes the action items required in this permit.

Table 1.2 REPORTING, RECORDKEEPING, and MONITORING SUMMARY

Requirement Description	Frequency	Permit Condition
Fugitive complaint log	As needed	. 2.3
Visible emission inspections of cyclones/baghouse/truck bins	Every calendar quarter	2.5
Maintaining on-site records	Five years	2.6
Monitor throughput of all kilns	Monthly and 12 month summation	4.5
Cyclone and baghouse daily hours of operation	Daily	5.5

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## 2. FACILITY-WIDE CONDITIONS

## **Fugitive Emissions**

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:
  - Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;
  - Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust;
  - Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose
    and vent the handling of dusty materials. Adequate containment methods should be employed during
    sandblasting or other operations;
  - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;
  - · Paving of roadways and their maintenance in a clean condition, where practical;
  - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall comply with the fugitive dust management plan submitted to DEQ on January 15, 2003. Updated as necessary, the plan shall identify all sources at the facility which may emit fugitive dust, appropriate dust control methods for each source, and recordkeeping procedures for documenting the frequency and methods used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

#### Visible Emissions

2.4 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

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2.5 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential point source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance. The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test, and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

## Monitoring and Recordkeeping

The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request

#### Excess Emissions

2.7 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

## Reports and Certifications

Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

Air Quality Permit Compliance Department of Environmental Quality Coeur d'Alene Regional Office 2110 Ironwood Parkway Coeur d'Alene, ID 83814

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## Fuel-burning Equipment

2.9 The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gaseous fuel.

## **Open Burning**

2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.

## Air Stagnation Advisory Days

2.11 The permittee shall comply with the requirements of IDAPA 58.01.01.550 through 562, Air Pollution Emergency Rule.

## **Obligation to Comply**

2.12 Receiving this permit shall not relieve the owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

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#### 3. NATURAL GAS-FIRED BOILERS - NO.1 AND NO.2

## 3.1 Process Description

The Cleaver Brooks boilers generate steam for the lumber drying kilns.

#### 3.2 Control Description

Boiler emissions from the combustion of natural gas are uncontrolled.

#### **Emissions Limits**

## 3.3 Emissions Limits

Emissions of PM<sub>10</sub>, NO<sub>x</sub> and CO from the boilers shall not exceed any corresponding emissions rate limits listed in the following table:

**Table 3.1 BOILER EMISSIONS LIMITS** 

Source Description	PM <sub>10</sub>	VOC	NO <sub>x</sub>		VOC NO <sub>x</sub> CO		<b>20</b>
	lb/day	T/yr	lb/hr	T/yr	lb/hr	T/yr	
Gas-Fired Boiler No.1	5.28	0.71	2.93	12.8	2.46	10.8	
Gas-Fired Boiler No.2	2.64	0.35	1,47	6.42	1.23	5.39	

[PTC Condition]

## **Operating Requirements**

## 3.4 Boiler Fuel Specification

To demonstrate compliance with Permit Condition 3.3, Boiler No. 1 and Boiler No.2 shall be fired on natural gas exclusively.

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## 4. DRYING KILNS

## 4.1 Process Description

The facility consists of four lumber drying kilns used to dry green lumber. The drying kilns are heated using non-contact steam coils, with steam being supplied by two natural gas-fired boilers.

## 4.2 Control Description

Kiln emissions from the lumber drying process are uncontrolled.

#### **Emission Limits**

#### 4.3 Emission Limits

Emissions from the drying kilns shall not exceed the following:

- PM 7.15 T/yr
- PM<sub>10</sub> 7.15 T/yr
- PM<sub>10</sub> 78.24 lb/day
- VOC 97.50 T/yr

[PTC Condition]

## **Operating Requirements**

#### 4.4 Maximum Facility Throughput

- The maximum lumber throughput to the drying kilns shall not exceed 21.67 mmbdft/month board scale in any month.
- The maximum lumber throughput to the drying kilns shall not exceed 130 mmbdft/yr board scale in any consecutive 12-month period.

[PTC Condition]

## Monitoring and Recordkeeping Requirements

### 4.5 <u>Lumber Throughput</u>

The permittee shall monitor and record, on a monthly and annual basis, the lumber throughput to the drying kilns. The amounts shall be recorded as million board feet per year (mmbdft/yr) based on board scale, to demonstrate compliance with Permit Condition 4.4. The annual amount shall be based on a rolling 12-month summation.

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## 5. CYCLONES, PLANER CYCLONE BAGHOUSE, AND TARGET BOX

## 5.1 Process Description

The facility consists of several lumber processing areas, including remanufacturing, planer mill and a finger-jointing mill. Wood residuals (chips, shavings and wood dust) generated from these process areas are transferred to seven different cyclones where materials are separated from the air stream into two different truck bins.

#### 5.2 Control Description

The planer shavings cyclone is followed by a baghouse in series. All other cyclones vent directly to the atmosphere.

## **Emission Limits**

#### 5.3 Emission Limits

- Emissions of PM<sub>10</sub> from the target box, cyclones and baghouses shall not exceed the corresponding emissions limits listed in the following table.
- The total PM and PM<sub>10</sub> emissions from these emissions unit shall not exceed the following:
  - PM 22.7 T/yr
  - PM<sub>10</sub> 13.8 T/yr

**Table 5.1 BAGHOUSE AND CYCLONE EMISSIONS LIMITS** 

Patrix Sarrana Danautasilana	PM <sub>10</sub>		
Point Source Description	lb/day		
Old Planer Cyclone, No.1	45.4		
Trim Saw and Hammer Hog Cyclone, No.2	2.6		
In-Line Cyclone (pull-through), No.7	2.6		
Rip Saw Cyclone, No.3	2.6		
New Planer Cyclone, No.4	33.1		
Chip Bin Target Box	6.5		
Finger Jointer Cyclone, No.5	3.1		
Finger Jointer Cyclone (pull-through), No.6	3.1		

[PTC Condition]

## **Operating Requirements**

#### 5.4 Operating Hour Limits

Each cyclone and baghouse shall not be operated more than 20 hours per day.

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## Monitoring and Recordkeeping

## 5.5 Monitor Hours of Operation

The permittee shall monitor and record the daily hours of operations of each cyclone and baghouse to demonstrate compliance with Permit Condition 5.4.

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## 6. SUMMARY OF EMISSION LIMITS

#### MERRITT BROTHERS LUMBER COMPANY - ATHOL

Table 6.1 EMISSION LIMITS - HOURLY (Ib/hr) AND ANNUAL (T/Yr)

	PM PM <sub>16</sub>		со		NO <sub>x</sub>		VOC	
Source Description	T/yr	lb/day	T/yr	lb/hr	T/yr	lb/hr	T/yr	
·								T/yr
Gas-fired Boiler No. I		5.28		2.46	10.8	2.93	12.8	0.71
Gas-fired Boiler No.2		2.64		1.23	5.39	1.47	6.42	0.35
Drying Kilns	7.15	78.24	7.15					97.50
Old Planer Cyclone, No.1		45.4						
Trim Saw and Hammer Hog Cyclone, No.2		2.6						
In-Line Cyclone (pull-through), No.7		2.6						
Rip Saw Cyclone, No.3		2.6						
New Planer Cyclone, No.4		33.1						
Chip Bin Target Box		6.5						
Finger Jointer Cyclone, No.5		3.1						
Finger Jointer Cyclone (pull-through), No.6		3.1						
Total from Cyclones, Baghouse, and Target box	22.7		13.8					

Notes:

Compliance determined by a pollutant-specific U.S. EPA reference method, DEQapproved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

PM and PM<sub>10</sub> limits include condensibles.

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#### 7. GENERAL PROVISIONS

- 1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
- 2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
  - To enter upon the permittee's premises where an emissions source is located, or in which any records
    are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and
    conditions of this permit, to inspect any monitoring methods required in this permit, and require stack
    compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the
    Director.
- 4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- 5. In the event of any change in control or ownership of source(s) covered by this permit, the permittee and succeeding owner or controller shall notify DEQ of the change in ownership. Any proposed change(s) or modification(s) to this permit by the succeeding owner or controller shall be requested in accordance with the Rules for the Control of Air Pollution in Idaho.
- 6. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
- 7. The Director may require the permittee to develop a list of operation and maintenance procedures to be submitted to DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- 8. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.